

McDevitt & Miller LLP
Lawyers

420 West Bannock Street
P.O. Box 2564-83701
Boise, Idaho 83702

December 24, 2014

(208) 343-7500
(208) 336-6912 (Fax)

RECEIVED

2014 DEC 24 AM 10:42

IDAHO PUBLIC
UTILITIES COMMISSION
Chas. F. McDevitt
Dean J. (Joe) Miller
Celeste K. Miller

Via Hand Delivery

Jean Jewell, Secretary
Idaho Public Utilities Commission
472 W. Washington St.
Boise, Idaho 83720

**Re: IPC-E-14-26 Mountain Home Solar, LLC
 IPC-E-14-27 Pocatello Solar 1, LLC
 IPC-E-14-28 Clark Solar 1, LLC
 IPC-E-14-29 Clark Solar 2, LLC
 IPC-E-14-30 Clark Solar 3, LLC
 IPC-E-14-31 Clark Solar 4, LLC**

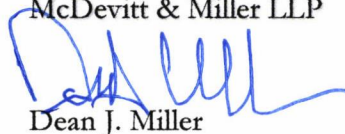
Dear Ms. Jewell:

Enclosed for filing, please find an original and seven (7) copies of a Motion To Permit Filing of Sur-Reply Comments for each of the cases listed above.

An additional copy of these documents and letter are included for return to me with your file stamp thereon.

Very Truly Yours,

McDevitt & Miller LLP



Dean J. Miller

DJM/hh
Enclosures

ORIGINAL

Dean J. Miller (ISB No. 1968)
McDEVITT & MILLER LLP
420 West Bannock Street
P.O. Box 2564-83701
Boise, ID 83702
Tel: 208.343.7500
Fax: 208.336.6912
joe@mcdevitt-miller.com

RECEIVED
2014 DEC 24 AM 10:43
IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for Mountain Home Solar, LLC, Pocatello Solar 1, LLC, Clark Solar 1, LLC, Clark Solar 2, LLC, Clark Solar 3, LLC, and Clark Solar 4, LLC

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION) CASE NO. IPC-E-14-26
OF IDAHO POWER COMPANY FOR)
APPROVAL OR REJECTION OF AN) MOTION TO PERMIT FILING OF
ENERGY SALES AGREEMENT WITH) SUR-REPLY COMMENTS
MOUNTAIN HOME SOLAR, LLC, FOR)
THE SALE AND PURCHASE OF)
ELECTRIC ENERGY.)

IN THE MATTER OF THE APPLICATION) CASE NO. IPC-E-14-27
OF IDAHO POWER COMPANY FOR)
APPROVAL OR REJECTION OF AN)
ENERGY SALES AGREEMENT WITH)
POCATELLO SOLAR 1, LLC, FOR THE)
SALE AND PURCHASE OF ELECTRIC)
ENERGY.)

IN THE MATTER OF THE APPLICATION) CASE NO. IPC-E-14-28
OF IDAHO POWER COMPANY FOR)
APPROVAL OR REJECTION OF AN)
ENERGY SALES AGREEMENT WITH)
CLARK SOLAR 1, LLC, FOR THE SALE)
AND PURCHASE OF ELECTRIC)
ENERGY.)

IN THE MATTER OF THE APPLICATION) CASE NO. IPC-E-14-29
OF IDAHO POWER COMPANY FOR)
APPROVAL OR REJECTION OF AN)
ENERGY SALES AGREEMENT WITH)
CLARK SOLAR 2, LLC, FOR THE SALE)
AND PURCHASE OF ELECTRIC)
ENERGY.)

IN THE MATTER OF THE APPLICATION) CASE NO. IPC-E-14-30
OF IDAHO POWER COMPANY FOR)
APPROVAL OR REJECTION OF AN)
ENERGY SALES AGREEMENT WITH)
CLARK SOLAR 3, LLC, FOR THE SALE)
AND PURCHASE OF ELECTRIC)
ENERGY.)

IN THE MATTER OF THE APPLICATION) CASE NO. IPC-E-14-31
OF IDAHO POWER COMPANY FOR)
APPROVAL OR REJECTION OF AN)
ENERGY SALES AGREEMENT WITH)
CLARK SOLAR 4, LLC, FOR THE SALE)
AND PURCHASE OF ELECTRIC)
ENERGY.)

COMES NOW Intermountain Energy Partners (IEP), on behalf of the above captioned projects, and moves the Commission, pursuant to RP. 56 and 256, for an order permitting filing of Sur-Reply Comments, to be filed no later than January 5, 2015, and in support thereof respectfully shows as follows, to wit:

1. Commission Orders and Notices issued in these matters established a Comment deadline of December 19, 2014 and a Reply deadline of December 26, 2014.

2. Previously, on November 20, 2014, Idaho Power Company (Idaho Power) filed Initial Comments updating pricing schedules in the Energy Sales Agreements (ESAs) taking into account adjustments approved by the Commission in *Boise City Solar*.

3. The remaining major issue (putting aside whether to approve minor pricing adjustments recommended by Commission Staff) is whether the Commission should approve ESAs containing prices set forth in Exhibit E or Exhibit F (as adjusted) of the ESAs. (The "Ex E or Ex. F Issue").

4. On December 19, 2014, IEP filed Initial Comments addressing the Ex. E or Ex. F Issue. Commission Staff filed Comments on the same date and touched on the Ex. E or Ex. F Issue.

5. Idaho Power did not file Comments on December 19, 2014.

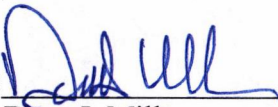
6. Instead, Idaho Power filed Reply Comments on December 23, 2014 in which Idaho Power set forth its views on the Ex. E or Ex F issue.

7. IEP desires, and should be permitted, to respond to Idaho Power's Reply Comments.

8. Taking into account holiday schedules and the time required to prepare a thoughtful response on the Ex. E or Ex. F issue, IEP requests the Commission to set January 5, 2015 as the date for filing Sur-Reply Comments.

9. The undersigned has spoken to counsel for Commission Staff, and is informed Staff does not object. The undersigned has spoken to counsel for Idaho Power, and is informed Idaho Power will not file a formal objection.

Dated this 24 day of December, 2014.

By: 
Dean J. Miller
*Attorney for Mountain Home Solar, LLC, Pocatello
Solar 1, LLC, Clark Solar 1, LLC, Clark Solar 2,
LLC, Clark Solar 3, LLC, and Clark Solar 4, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of December, 2014, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

Jean Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
P.O. Box 83720
Boise, ID 83720-0074
jjewell@puc.state.id.us

Hand Delivered
U.S. Mail
Fax
Fed. Express
Email

☒
☐
☐
☐
☐

Kristine Sasser, Deputy Attorney General
Idaho Public Utilities Commission
472 W. Washington St.
Boise, Idaho 83720
kris.sasser@puc.idaho.gov

Hand Delivered
U.S. Mail
Fax
Fed. Express
Email

☐
☐
☐
☐
☒

Donovan E. Walker
Randy C. Allphin
Regulatory Dockets
Idaho Power Company
1221 West Idaho Street
P.O. Box 70
Boise, ID 83707
dwalker@idahopower.com
rallphin@idahopower.com
dockets@idahopower.com

Hand Delivered
U.S. Mail
Fax
Fed. Express
Email

☐
☐
☐
☐
☒

BY: Heather Hough, Legal Asst.
MCDEVITT & MILLER LLP